

AMERY TELCOM, INC.

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October 5, 2007

Sandra J. Paske
Secretary to the Commission
Public Service Commission of Wisconsin
P.O. Box 7854
Madison, WI 53707-7854

Re: Investigation of Area Code Relief for the 715 Area Code in Northern Wisconsin, Commission Docket 05-TN-100

Dear Ms. Paske:

On behalf of Amery Telcom, Inc. and Somerset Telephone Company, Inc., I am writing to encourage the Commission to adopt a geographic split of the 715 area code rather than an overlay. Understanding that both methods of area code relief planning have various drawbacks and benefits, I believe that a geographic split is the best solution with the impending exhaust of the 715 area code.

A geographic split has proven to be effective in other areas of Wisconsin. When considering other area code relief plans, the Commission has continually adopted geographic splits. This is an indication of the importance that the Commission has placed on ease of use (i.e., 7-digit rather than 10 digit dialing) and the significance residents place on an area code as being an identifier of a specific geographic region. Applying an overlay would require 10-digit dialing throughout the area code. Further, it would create an extremely large area for an area code overlay. While there are examples of rural area code overlays in the U.S., large rural areas like the 715 territory will be better served with a geographic split that creates two distinct area codes.

Also, I want to comment on the characterization of the overlay as being the "industry consensus" plan. As one of the parties that took part in the conference calls on this issue (in 2002), I recall that the rural, Wisconsin-based carriers were generally in favor of a geographic split. While the final vote may have been in favor of an overlay, the Commission should be aware that it was not a unanimous decision.

I believe that the customers of Amery Telcom and Somerset Telephone Company will be better served with a geographic split rather than an overlay plan.

Sincerely,

Michael D Jensen /s/
Michael Jensen
President, Amery Telcom, Inc. and Somerset
Telephone Company, Inc.